

August 30, 2005

Department of Ecology
Water Quality Program
AUG 31 2005

Western Washington Municipal SW Comment
Bill Moore
WA Department of Ecology
Water Quality Program
PO Box 47600
Olympia, WA 98504-7600

Re: National Pollutant Discharge Elimination System and State Waste Discharge
General Permit for Discharges from Small Municipal Separate Storm Sewers

Dear Mr. Moore:

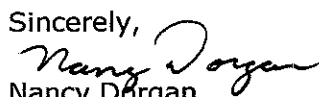
I would like to request that the City of Port Townsend be added to DOE's list of Phase II small municipalities.

Port Townsend is surrounded on three sides by waters of the State that contain listed summer chum and Chinook salmon. Compliance with the protective standards of the Phase II NPDES Permit will protect water quality and critical habitat and help the survival of those species. During a recent public open house on Port Townsend's draft Shoreline Master Program update, presenter Ann Murphy of the Marine Science Center at Fort Worden stated that in the last 2 years, we have lost 4% of our local eelgrass -- and that we don't know why. I think Port Townsend's obsolete stormwater standards contribute to this decline.

The City recently completed its 7-year GMA update by adopting a Critical Areas Ordinance that purports to regulate development with Best Available Science. The standards of this ordinance will govern the City's shorelines and wetlands that receive stormwater runoff. The CAO's Findings stated the City's good intentions to adopt in a future process a Stormwater Management Plan (anticipated since 1996) and to revise engineering design standards based on DOE's updated Manual. In the meantime, however, and despite GMA's BAS requirements, the City only requires the very out-of-date standards of DOE's 1992 Stormwater Management Manual for the Puget Sound Basin.

Significant new development and road construction are expected in Port Townsend as the city continues to grow. It is likely that our population will reach 10,000 by the time of the next census. Better natural resource protection is needed here now, and improved stormwater management standards are crucial.

Thank you for your consideration of this request.

Sincerely,

Nancy Dorgan
2137 Washington St. #7
Port Townsend, WA 98368